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Health Services Department

EMERGENCY MEDICAL SERVICES

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May 24, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W. - Room 222
Washington, DC 20554

Dear Ms. Searcy:

In reference to the **Private Land Mobile Radio (PLMR) Services** and the modification of the policies governing those services (PR Docket No. 92-235, the replacement of Part 90 by Part 88), we have the following comments:

1. As the regulatory agency responsible for emergency medical services serving a population of 850,000, we rely heavily on the existing radio system. The proposed changes will require replacement of all radio equipment in every hospital and every ambulance in the county. At this time of severe budget cutbacks, the county government will not be able to provide the funds needed to replace the radio system, resulting in decreased emergency medical care for the citizens of Contra Costa County.
2. In effect, PR Docket 92-235 is a locally mandated program; therefore, we believe that the federal government should provide a changeover funding source, such as seed funding through block grants, for local government agencies.
3. The current licensee should remain the licensee for the narrowband channels which will be split out of the wideband channels, up to the year 2005. This will give local government agencies the time required to make the required changeover in equipment that the new narrowband channels will require.
4. Public safety and emergency services agencies must be allowed to retain their control over their radio traffic. Use of frequency coordinating agencies, as proposed, creates the possibility of public safety agencies losing channel exclusivity, which will significantly affect their ability to respond to emergency requests.

We urge the members of the Federal Communications Commission to seek input from local, regional and state communication directors. To place the burden and costs of the problems addressed in this legislation on the backs of local government is not an appropriate answer.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Art Lathrop', is written over a horizontal line.

Art Lathrop
Emergency Medical Services Director